

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ABBOTT GMBH & CO., KG,)	
ABBOTT BIORESEARCH CENTER, INC.,)	
AND ABBOTT BIOTECHNOLOGY LTD.,)	C.A. No. 4:09-CV-11340 (FDS)
)	
Plaintiffs,)	
)	JURY TRIAL DEMANDED
v.)	
)	
CENTOCOR ORTHO BIOTECH, INC. AND)	
CENTOCOR BIOLOGICS, LLC.,)	
)	
Defendant.)	

**DECLARATION OF MATTHEW A. PEARSON IN SUPPORT OF DEFENDANTS’
REPLY TO PLAINTIFFS’ OPENING CLAIM CONSTRUCTION BRIEF**

I, Matthew A. Pearson, declare and state as follows:

1. I am an attorney at the law firm Akin Gump Strauss Hauer and Feld LLP, counsel for Centocor Ortho Biotech, Inc. and Centocor Biologics, LLC, and as such I am familiar with the facts stated herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the September 30, 2010 deposition of Michael J. Grusby, Ph.D.

3. Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No. 6,914,128.

4. Attached hereto as Exhibit 3 is a true and correct copy of Abbotts’ Tutorial submitted to the U.S. Patent Office and dated May 29, 2009.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 4, 2010

A handwritten signature in black ink, appearing to read 'Matthew A. Pearson', written over a horizontal line.

Matthew A. Pearson